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**Jefferson Processing's Responses to U.S. EPA's  
Written Inquiries pursuant to  
Section 104(e) of CERCLA**

1. Identify all persons consulted in the preparation of the answers to these Information Requests.

The following individuals were consulted for the following types of information:

1. Catherine Glorious -

Catherine Glorious bought the Jefferson Processing property at a Sheriff's sale in July, 1994. Thereafter, she began to sell slag and attempted to sell lime and other aggregates from the property that was generated by operations predating her ownership and operation of the

**NON-RESPONSIVE**

2. Gary Smith -

Gary Smith is Catherine Smith's son-in-law. Mr. Smith is President of Argo Sales, Inc. Argo Sales, Inc. was, and is, a third party contractor to Catherine Glorious, providing her with labor and equipment as needed to oversee Jefferson Processing. Mr. Smith resides at:

**NON-RESPONSIVE**

Mr. Smith has no involvement in a personal capacity at the Site.

3. Mike Swickard -

Mike Swickard began working under the direction of Catherine Glorious in February, 1995. He has worked at the site regularly fulfilling Catherine's direction and goal for the property. He has also been instrumental in protecting the transformers and capacitors from vandalism, and a resulting release of PCBs to the environment.

Mr. Swickard resides

**NON-RESPONSIVE**

2. Identify all documents consulted, examined, or referred to in the preparation of the answers to these Requests, and provide copies of all such documents.

Copies of documents in the immediate possession of Mrs. Glorious' legal counsel and referred to in these responses are copied and included with these responses. Other documents likely exist at the site. However, the site's office has been the subject of vandalism and some records have been taken. The remaining records, to the extent that they are responsive, will be provided to the U.S. EPA as a supplement to this response. Other documents responsive to U.S. EPA's requests may be found in the possession of U.S. EPA itself at its various offices (Westlake and Chicago) and the Ohio EPA central office in Columbus, and the Ohio EPA's southeast district office in Logan, Ohio.

3. If you have reason to believe that there may be persons able to provide a more detailed or complete response to any Information Request or who may be able to provide additional responsive documents, identify such persons.

Persons who may be able to provide a more detailed or complete response to any Information Request would include representatives of the entities named in **number 5 below**, who are largely unknown to Mrs. Glorious or any persons who assisted in framing these responses.

4. List the EPA Identification Numbers of the Respondent.

With the exception of its TSCA number which is OHD010467538, Jefferson Processing has no EPA Identification Numbers.

Past owners and operators listed below, whose activities were dissimilar to Jefferson Processing's activities did have EPA Identification numbers associated with permits and authorizations issued to emit air pollutants, water pollutants, and generate waste streams.

However, Jefferson Processing had no relationship with the previous owners and operators, and is not in possession of those numbers. Said identification numbers should be in the files of U.S. EPA, Ohio EPA Central office, Ohio EPA's Southwest District office, and the former files of the Northern Ohio Valley Air Authority.

5. Identify the acts or omissions of any persons, other than your employees, contractors or agents, that may have caused the

release or threat of release of hazardous substances, pollutants, or contaminants at the Site, and damages resulting therefrom.

Although U.S. EPA chooses to define the Site to include 61 acres, the "Site" is approximately 325 acres. The Site consists of three or four earthen terraces beginning with the first floor of the buildings, up to a second earthen terrace which contained material bins for material brought in by railroad for processing, to a third earthen terrace which contains the railroad spur where material was shipped in and out, to a fourth earthen terrace that contains additional by-products of the previous ferro-alloy production facility and materials owned by the U.S. Defense Logistics Agency and/or Government Services Administration. Each of these levels are integrally related to, and associated with, the production that occurred in the buildings on the first earthen level. By-products similar to those readily visible when one enters the site also exist on the fourth terrace of the Site in the back, high above the facility. In fact, a U.S. EPA contractor reported that a slag pile existed on the top of a hill above the plant operation area that was two miles long and 320 feet high.

Using the broader definition of "Site" -- which more accurately characterizes the historical use of the site and the resulting residual contamination present today -- the following entities are hereafter identified as potentially responsible parties who have conducted past operations, or have some relationship to entities that had conducted past operations, at the Site:

Foote Mineral Company	Ferro-alloy Production
Vanadium Corporation	Ferro-alloy Production
Satralloy Incorporated	Ferro-alloy Production
Satra Concentrates, Inc.	Recovery of chrome from slag waste; sale of slag
Ara Oztemel, President Satra Concentrates, Inc. Oneida Drive Greenwich, CT 06830	Recovery of chrome from slag waste
Agop Chalekian Satra Corporation 599 West Putnam Avenue Greenwich, CT 06830	Association with Satra entities
Agop Chalekian	Association with Satra

Satra Industrial Holding Ltd. entities  
599 West Putnam Avenue  
Greenwich, CT 06830

Lou DiPaolo, Site Manager  
Satra Concentrates, Inc.  
54579 National Road  
Martins Ferry, Ohio

Recovery of chrome from  
slag waste

U.S. Defense Logistics  
Agency  
Chicago, IL  
or  
General Services  
Administration

Storage of 100,000 tons  
of chrome ore at property

Storage of 100,000 tons  
of chrome ore at property

AMAX

AMAX bought Vanadium  
Corporation

Phelps Dodge Corporation  
Denver, Colorado

Phelps Dodge Corporation  
bought AMAX

Michael Leech  
Phelps Dodge Corporation  
Denver, Colorado  
(480) 929-4452

Representative of Phelps  
Dodge Corporation

Jefferson County Engineer  
Jim Brannigan  
Country Road 43  
Wintersville, OH  
(740) 283-8574

Mixed asphalt/blacktop  
at site for subsequent  
use on Jefferson County  
roads.

Cross Creek Township  
P.O. Box 2202  
Wintersville, OH 43953  
(740) 264-0997

Stored slag on Site.

6. Identify all persons having knowledge or information about the generation, transportation, treatment, disposal, or other handling of hazardous substances by you, your contractors, or by prior owners and operators.

Knowledge About Prior Owners and Operators

Ara Oztemel, President  
Satra Concentrates, Inc.  
Oneida Drive  
Greenwich, CT 06830

Recovery of chrome from  
slag waste

Agop Chalekian  
Satra Corporation

Association with Satra  
entities

599 West Putnam Avenue  
Greenwich, CT 06830

Lou DiPaolo, Site Manager  
Satra Concentrates, Inc.  
54579 National Road  
Martins Ferry, Ohio

Recovery of chrome from  
slag waste

7. Describe the nature of Respondent's business.

The Site upon which Jefferson Processing is located was acquired by Catherine Glorious with the hope of gradually and eventually removing the slag and materials from the Site and donating it to the Catholic church for camp grounds and retreats. Upon securing ownership of the facility, Mrs. Glorious sought the assistance of two former employees of the Satra Concentrates and the three individuals worked together to secure the site, begin the sale of slag, and find purchasers for the lime on the lower portion of the Site. Hence, Jefferson Processing segregated two large piles of slag that remained at the Site, and separated it by size of slag, as requested by, and for sale to, customers. Over time, all of the slag was sold.

Jefferson Processing does not generate waste.

Jefferson Processing has continued to secure and maintain the site with the hope of rehabilitating it and transferring it to the church. Unfortunately, Mrs. Glorious was not a sophisticated purchaser, and was unaware of the residual environmental issues associated with the Site. No site assessment or legal advice was used by Mrs. Glorious in conjunction with her purchase.

8. Identify the officers of Jefferson Processing by name and title.

Jefferson Processing is a sole proprietorship. Hence, it is solely owned by Catherine Glorious.

9. Identify all employees of Jefferson Processing.

Jefferson Processing has no employees. All personnel other than Catherine Glorious was, and is, contract labor.

10. Did you ever use, purchase, store, treat, dispose, transport or otherwise handle any hazardous substances or materials?

Using the definition of "material" contained in Attachment A, Jefferson Processing sold a "material" otherwise known as slag. Jefferson Processing also occasionally sold metal scrapped from the facility to support security and maintenance

at the facility when it ceased selling slag. In those instances when Jefferson Processing has analyzed its slag, the slag did not exhibit the characteristics of a hazardous waste. This finding is also consistent with previous and recent analyses of Ohio EPA and Satra Concentrates.

11. Identify all liability insurance policies held by Respondent from 1994 to present. In identifying such policies, state the name and address of each insurer and of the insured, the amount of coverage under each policy, the commencement and expiration dates for each policy, whether or not the policy contains a "pollution exclusion" clause, and whether the policy covers or excludes sudden, nonsudden, or both types of accidents. In lieu of providing this information, you may submit complete copies of all relevant insurance policies.

Jefferson Processing has never had liability insurance or purchased a liability insurance policy.

12. Provide copies of all income tax returns for Jefferson Processing sent to the Federal Internal Revenue Service in the last five years.

Jefferson Processing is a sole proprietorship owned by Catherine Glorious. Revenues and expenses associated with its operation are reflected on schedule C of Mrs. Glorious' 1040. Tax returns for the calendar years 1999 - 1996 are provided. Mrs. Glorious' accountant, who does not have a copy of the 1995 return, will request that the Internal Revenue Service forward the 1995 return to him. Upon its receipt, the return will be forwarded to U.S. EPA.

13. If Respondent is a Corporation, respond to the following requests:

Jefferson Processing is not a corporation.

14. Describe the nature of your activities or business at the Site, with respect to purchasing, receiving, processing, storing, treating, disposing, or otherwise handling hazardous substances or materials at the Site.

When Catherine Glorious bought the property, it contained some piles of slag in addition to other by-products associated with historical industrial activities at the Site. Periodically, slag from certain piles was placed into a bin. Once in the bin, the slag fell onto a shaking screen where it was sized and discharged. The various sizes of slag were then sold to customers by size depending upon its use.

15. State the dates during which Jefferson Processing owned, operated, or leased the Site, and provide copies of all documents evidencing or relating to such ownership, operation, or lease arrangement (e.g., deeds, leases, etc.).

Catherine Glorious, doing business as Jefferson Processing, purchased the Site on July 8, 1994. It continues to own the Site.

16. Provide all documents, including invoices and purchase orders, relating to Jefferson Processing's sale or other transfer of salvaged materials from the Site since 1994.

To the extent that they are available at the Site, they will be forwarded to U.S. EPA as a supplement to this Request.

17. Provide information about the Site, including but not limited to the following:

- a) Location of underground utilities (telephone, electrical, sewer, water main, etc.);

Information is not available.

- b) Surface structures (e.g., buildings, tanks, etc.);

Surface structures on the Site or adjoining the site include:

- i. Two main buildings (J1) and (J2)
- ii. Pump building
- iii. Old house used as administrative offices
- iv. Water cooling towers
- v. Transformers
- vi. Waste water treatment plant

- c) Ground water wells, including drilling logs;

One ground water well exists at the site. No logs are available.

- d) Storm water drainage system, and sanitary sewer system, past and present, including septic tanks, subsurface disposal field(s), and other underground structures; and where, when, and how such systems are emptied;

A waste water treatment plant which serviced the facility is located across Gould Road. To the best of Jefferson Processing's knowledge, a stormwater drainage system does not exist at the site. It is limited to surface flow and diversion to a body of surface water.

- e) Any and all additions, demolitions, or changes of any kind on, under, or about the Site, to its physical structures, or to the property itself (e.g. excavation work); and any planned additions, demolitions, or other changes to the Site; and

None have occurred. None are planned.

- f) All maps and drawings of the Site in your possession.

Any and all maps and drawings in the possession of Jefferson Processing are included with the documents accompanying these responses. Jefferson Processing's maps of the facility are the product of other reports and assessment performed at the Site. Hence, U.S. EPA officials are encouraged to consult and refer to the various maps attached to the various site assessments.

18. Were any PCB transformers removed from the Site? If yes, identify the transformers that were removed, provide the date such transformers were removed from the Site, and provide documents showing disposal of such transformers. If no transformers have been removed, describe what was removed from the area that is now a large hole inside one of the buildings, Plant J1, on the Site.

According to former plant personnel predating Jefferson Processing's ownership of the Site, one or more PCB transformers were sold by Satra Concentrates or Satralloy for gain. (Source: Frank DiCeasar - deceased). No transformers have been sold by Jefferson Processing or removed from the Site by Jefferson Processing during its ownership of the Site. As for the area in Plant J1 that is the site of a large hole, Mike Swickard can identify at least ten holes in building J1. More specific information or a better delineation is required to adequately and accurately respond to the Agency's inquiry about a specific hole.

19. Provide a copy of all documents in your possession which relate or refer to the 13 PCB transformers remaining on Site.

Information in Jefferson Processing's possession pertaining to the PCB transformers is attached hereto. Additional information may yet remain at the Site, but some of the information was taken during vandalism. Additional information may already be in the possession of U.S. EPA. Other information regarding the transformers and PCB sampling results associated with soil around the large PCB transformers and other locations at the Site should be available by contacting Ohio EPA's PCB Unit in the Division of Emergency and Remedial Response. Craig Smith of Ohio EPA conducted a limited PCB sampling event in the Spring of 1997.

20. Identify all past and present solid waste units (e.g., waste piles, landfills, surface impoundments, waste lagoons, waste ponds or pits, tanks container storage areas, etc.) on the Site [or your property]. For each such solid waste unit identified, provide the following information:

Jefferson Processing lacks the expertise necessary to answer these questions. Neither does it have any relationship with nor can it afford the services of an environmental consultant to assist it in the delineation of its Site relative to these questions. Both U.S. EPA and Ohio EPA previously have spent

both time and dollars assessing this Site's condition. (U.S. EPA in 1991 and 1992, and Ohio EPA in 1997). Hence, these questions are better answered by U.S. EPA and/or Ohio EPA through a review of information generated by their past regulatory activities at the site and/or the remedial investigations conducted by State and federal personnel or their contractors. Said information and data should be in their files.

Jefferson Processing calls U.S. EPA's attention to the reports produced with these responses in the section entitled "Documents Related to Previous Site Investigations".

Finally, while it realizes that it in no way diminishes its status as a current owner or operator of the Site, Jefferson Processing assures U.S. EPA that it neither created, operated, used, managed, or closed, any solid waste units (e.g., waste piles, landfills, surface impoundments, waste lagoons, waste ponds or pits, tanks, container storage areas, etc.) at the Site.

- a) A map showing the unit's boundaries and the location of all known solid waste units either currently in operation or not. This map should be drawn to scale, if possible, and clearly indicate the location and size of all past and present units;

See maps attached to various site investigations provided herewith.

- b) The type of unit (e.g., storage area, landfill, waste pile, etc.), and the dimensions of the unit);
- c) The dates that the unit was in use;
- d) The purpose and past usage (e.g., stage, spill containment, etc.);
- e) The quantity and types of materials (hazardous substances and any other chemicals) located in each unit; and
- f) The construction (materials, composition), volume, size, dates of cleaning, and condition of each unit.
- g) If unit is no longer in use, how was such unit closed and what actions were taken to prevent or address potential or actual releases of waste constituents from the unit.

Jefferson Processing is without information necessary to respond to subparagraphs (b) - (g). Information likely exists in the files at Ohio EPA and may be available through Lou DiPaola.

- 21. Provide copies of all local, state, and federal environmental permits ever granted for the Facility or any part thereof

(e.g., RCRA permits, NPDES permits, etc.)

Jefferson Processing was not issued any permits by any local, state or federal environmental agency. It does, however, provide U.S. EPA with information in its files on permits issued to past owners and operators of the Site.

Satralloy was issued RCRA I.D. # OHD010467538.

Satra Concentrates was issued NPDES Permit No. OHID00036\*CD

22. Did the Facility ever have "interim status" under RCRA? If so, and the Facility does not currently have interim status, describe the circumstance under which the Facility lost interim status.

Satralloy operated under interim status. At some time in 1987, it appears that Satralloy (or Satra Concentrates) applied to the U.S. EPA Waste Management Division to terminate its interim status, as well as to rescind the U.S. EPA waste generator identification number. It justified the application on the basis that Satra Concentrates ceased ferrochromiumsilicon manufacturing activities. The U.S. EPA honored the application and its U.S. EPA RCRA I.D. number was canceled.

If Jefferson Processing had violated RCRA interim status provisions -- which it didn't --, it assumes that it would have been notified by Ohio EPA's Division of Hazardous Waste Management with specific regard to that issue. It was not.

23. Did the Facility ever file a notification of hazardous waste activity under RCRA? If so, provide a copy of such notification.

Jefferson Processing never generated, transported, and/or treated, stored, or disposed of hazardous waste. Hence, it never filed such a notification.

24. Provide all reports, information, or data related to soil, water (ground and surface), or air quality and geology/hydrology at and about the Site. Provide copies of all documents containing such data and information, including both past and current aerial photographs as well as documents containing analysis or interpretation of such data.

All documents in Jefferson Processing's possession responsive to the above are attached hereto. Jefferson Processing also suggests that additional information responsive to the above are in the files of U.S. EPA, the Ohio EPA, and former owners and operators of the Site.

25. Are you or your consultants planning to perform any investigations of the soil, water (ground or surface),

geology, hydrology, or air quality on or about the Site?

Jefferson Processing has not contracted with any environmental consultants to investigate any areas of the Site. It has does not have the resources or financial ability to afford such services.

26. Identify all leaks, spills, or releases into the environment of any hazardous substances, pollutant, or contaminants that have occurred at or from the Site. In addition, identify:

On or about the afternoon of October 21, 1996, a small quantity of diesel fuel was released to the environment during a refueling operation at Jefferson Processing.

- a) When such releases occurred;

October 21, 1996.

- b) How the release occurred;

The release occurred during the refueling of equipment.

- c) The amount of each hazardous substances, pollutants, or contaminants so released;

Approximately ten to fifteen gallons of diesel fuel.

- d) Where such releases occurred;

Jefferson Processing.

- e) Any and all activities undertaken in response to each such release or threatened release, including the notification of any agencies or governmental units about the release.

An absorbent boom was placed across Cross Creek down gradient of the point of release into the creek.

- f) Any and all investigations of the circumstance, nature, extent or location fo each release or threatened release including, the results of any soil, water (ground and surface), or air testing undertaken; and

Release was minimal in quantity and did not require any remedial activities.

- g) All persons with information relating to those releases.

Mingo Junction Fire Chief  
Robert Stevens  
Ohio EPA On-scene coordinator  
Gary Smith

Information about the release is also documented in Ohio EPA Spill Report 9610-41-04469.

27. Was there ever a spill, leak, release or discharge of hazardous materials into any subsurface disposal system or floor drain inside or under any building on the Site?

No. To the best of its knowledge, Jefferson Processing has no subsurface disposal system or floor drains inside or under any building on the Site.

28. Did any leaks, spills, or releases of hazardous materials occur on the Site when such materials were being:

- a) Delivered by a vendor;

No. Jefferson Processing does not receive any materials from vendors.

- b) Stored (e.g., in any tanks, drums, or barrels);

See Jefferson Processing's response to Information Request No. 26.

- c) Transported or transferred (e.g., to or from any tanks, drums barrels, or recovery units); or

No.

- d) Treated.

No.

29. Has soil ever been excavated or removed from the Site?

No soil has been excavated or removed from the Site during Catherine Glorious' ownership and oversight of the Site.

30. Provide a copy of the title and registration of all earth-moving equipment at the Site.

Currently, a Caterpillar 988 A front end loader is located at the Site. Jefferson Processing has neither a title nor a certificate of registration for the equipment. It is leased from Argo Sales, Inc. pursuant to a lease agreement. Argo Sales, Inc. likely has evidence of ownership of the equipment.